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March 1, 2023

VIA CM/ECF

The Honorable Richard G. Andrews
United States District Court
for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street
Wilmington, Delaware 19801

**Re: *Del. State Sportsmen's Ass'n, Inc., et al. v. Del. Dep't of Safety
and Homeland Sec., et al.; Gabriel Gray, et al. v. Kathy Jennings,
et al.*, C.A. No. 22-cv-951-RGA (Consolidated)**

Dear Judge Andrews:

I write in response to the Court's Oral Order of March 1, 2023 (D.I. 49) regarding the letter from the Bureau of Alcohol, Tobacco, and Firearms displayed on slide 23 of Defendants' presentation at the preliminary injunction hearing.

The letter was posted by the National Firearms Act Trade & Collectors Association and can be found at http://www.nfatca.org/pubs/MG_Count_FOIA_2016.pdf. Because this information was not included in the briefing, Defendants advised Plaintiffs in advance of the hearing that it might rely upon the information. A copy of the email so advising Plaintiffs is attached as Exhibit A hereto.

Counsel apologizes for not including a citation to the letter in the presentation.

The Honorable Richard G. Andrews

March 1, 2023

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Respectfully submitted,

/s/ David E. Ross

David E. Ross (#5228)

cc: All Counsel of Record (via CM/ECF)